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May 16, 2025

The Honorable Jennifer L. Rochon  
U.S. District Court – SDNY  
500 Pearl Street  
New York, NY 10007

**Re: US v. Luis Martinez, et al**  
**Dkt # 24 cr 376**

**SO ORDERED.**

  
\_\_\_\_\_  
JENNIFER L. ROCHON  
United States District Judge

Dear Judge Rochon

With the consent of the government, I am requesting an adjournment of our May 21, 2025 status conference. This is the second request for an adjournment. The first request was filed by the government on behalf of the parties and was granted by the court. The adjournment is necessary because I am presently engaged in a murder trial in the New York Supreme Court, Bronx County (*PSNY v. Domingo Berroa, Indictment #862-2020*)<sup>1</sup>. I am requesting 30 days or a date that is convenient for the court. Due to my back-to-back murder trials in 2025<sup>2</sup>, I did not conduct my follow-up consultation with Mr. Martinez at the MDC-Brooklyn to discuss the status of plea negotiations and I need time to update Mr. Martinez and complete negotiations toward a possible resolution of this criminal action.

Thank you for your thoughtful consideration.

Sincerely,

**FOY & SEPLOWITZ LLC**



**JASON E. FOY**  
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The request for an adjournment of the May 21, 2025 status conference is GRANTED. The conference shall be adjourned to July 2, 2025 at 11:00 a.m. Speedy trial time is excluded until July 2, 2025. The Court finds that the ends of justice served by excluding such time outweigh the best interests of the public and the defendants in a speedy trial because of the parties' need to continue negotiations.

**Dated: May 16, 2025**  
**New York, New York**

<sup>1</sup> I am scheduled to present closing arguments on Monday, May 19<sup>th</sup> and given the facts and circumstances there may not be a verdict before May 21<sup>st</sup>. Even if there is a verdict before May 21<sup>st</sup>, I need time to follow up with Mr. Martinez regarding plea negotiations.

<sup>2</sup> PSNY v. Jaryran Liranzo 70082-22 January 30-2025-March 12, 2025 and PSNY v. Domingo Berroa, 862-2020 April 23<sup>rd</sup> – present.